

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 1997

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**ANSWER OF UNITED PARCEL SERVICE
TO INTERROGATORY OF
UNITED STATES POSTAL SERVICE
(USPS/UPS-2)**

(February 11, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the response of UPS to interrogatory USPS/UPS-2 of the United States Postal Service.

Respectfully submitted,


John E. McKeever
Attorney for United Parcel Service

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Of Counsel.


**ANSWER OF UNITED PARCEL SERVICE
TO INTERROGATORY OF
THE UNITED STATES POSTAL SERVICE**

USPS/UPS-2. Please provide data showing United Parcel Service's market share in the overnight, two-day, and ground package delivery markets. Please provide market share data by volume and revenue. Please provide the information separately for the following products: UPS Next Day Air, UPS Next Day Air Early A.M., UPS Next Day Air Saver, UPS 2nd Day Air, UPS 2nd Day Air A.M., UPS 3 Day Select, UPS Ground (residential), and UPS Ground (non-residential). Please provide the data for the period covering GFY 1996, October 1, 1995 through September 1996 and GFY 1997, October 1, 1996 through September 30, 1997. If the information is not available for the periods requested, please provide the data aggregated for the most recently available twelve month period.

Response to USPS/UPS-2. Since UPS does not know the total volume handled by all carriers in the specified "markets," UPS does not have the requested information.

DECLARATION

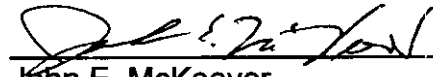
I, Linda Shepherd, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.


Linda Shepherd

Dated: February 10, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: February 11, 1998
Philadelphia, PA